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Attorneys for Defendant,
COUNTY OF SACRAMENTO
(erroneously sued herein as “Sacramento County
Sheriff’s Department”)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

YAPHETTE GEIGER; JETHRO GEIGER;
K.S., a minor, by and through their Guardian,
BRANDIE SMITH; K.G., a minor, by and
through their Guardian, BRANDI SMITH; and
N.G., a minor, by and through their Guardian,
ASIA LEE HERON; and JW GEIGER

Plaintiffs

v.

COUNTY OF SACRAMENTO,
SACRAMENTO COUNTY SHERIFF’S
DEPARTMENT and DOES 1 through 100,
inclusive,

Defendants.

No. 2:22-cv-0043 JAM DB

**JOINT STIPULATION AND ORDER TO
COMPEL PLAINTIFFS’ ATTENDANCE
FOR DEPOSITIONS**

Plaintiffs Yaphette Geiger; Jethro Geiger; K.S. Geiger; K.S., by and through their
Guardian Brandi Smith; K.G., by and through their Guardian Brandi Smith; N.G., by and
through their Guardian Asia Lee Heron, and J.W. Geiger (herein after “Plaintiffs”) and
Defendant County of Sacramento (herein after “Defendant”), by and through their counsel of
record (collectively “Parties”), hereby stipulate and request the Court enter an order compelling
the depositions of Plaintiffs.

Defendant has been diligently attempting to set the depositions of the Plaintiffs since April of 2023. Due to difficulties in obtaining these depositions, the parties sought the Court's assistance by way of an informal discovery conference on October 25, 2023. Defendant also filed a motion to compel the depositions, which is scheduled to be heard on November 17, 2023. The Parties agree that Plaintiffs' depositions are vital to the case and that Defendant is entitled to obtain their testimony. Based on the foregoing, the Parties hereby stipulate to an Order compelling the attendance of Plaintiffs for deposition. After conferring, the Parties agree that Plaintiffs should be required to appear for their depositions on November 8, 2023, and November 10, 2023, and seek an Order so stating. The Parties agree that the depositions will be conducted remotely through Zoom and as follows:

- November 8, 2023 at 9:00 a.m. – Deposition of Yaphette Geiger
- November 8, 2023 at 11:00 a.m. – Deposition of Jethro Geiger
- November 8, 2023 at 1:00 p.m. – Deposition of Brandi Smith
- November 10, 2023 at 10:00 a.m. – Deposition of Asia Heron
- November 10, 2023 at 1:00 p.m. – Deposition of JW Geiger

Dated: October 25, 2023

LONGYEAR & LAVRA, LLP

By: /s/ Nicole M. Cahill

VAN LONGYEAR

NICOLE M. CAHILL

DENNY YU

Attorneys for Defendant,

COUNTY OF SACRAMENTO

Dated: October 25, 2023

MOSLEY & ASSOCIATES

By: /s/ Nathalie Meza Contreras [as authorized 10-25-23]

Walter Mosley, Esq.

Carlos E. Montoya, Esq.

Nathalie Meza Contreras, Esq.

Attorneys for Plaintiffs

ORDER

Pursuant to the stipulation of the Parties, Plaintiffs are hereby ORDERED to appear for deposition, remotely via Zoom as follows:

- November 8, 2023 at 9:00 a.m. – Deposition of Yaphette Geiger
- November 8, 2023 at 11:00 a.m. – Deposition of Jethro Geiger
- November 8, 2023 at 1:00 p.m. – Deposition of Brandi Smith
- November 10, 2023 at 3:00 p.m. – Deposition of Asia Heron
- November 10, 2023 at 10:00 a.m. – Deposition of JW Geiger

Plaintiffs are cautioned that failure to abide by this Order may result in sanctions, up to and including terminating sanctions, pursuant to Federal Rule of Civil Procedure 37(b)(2)(A).

IT IS SO ORDERED.

DATED: October 26, 2023

/s/ DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE